

JAMES PUZEY (NV SBN 05745)  
[jpuzey@nvlawfirm.com](mailto:jpuzey@nvlawfirm.com)  
 KEARNEY PUZEY DAMONTE  
 800 South Meadows Parkway, Suite 800  
 Reno, Nevada 89521  
 Telephone: (775) 851-8700

SHERRIE M. FLYNN (*Pro Hac Vice*)  
[sflynn@ch-law.com](mailto:sflynn@ch-law.com)  
 ROBERT K. ASHLEY (*Pro Hac Vice Forthcoming*)  
[rashley@ch-law.com](mailto:rashley@ch-law.com)  
 COLEMAN & HOROWITT, LLP  
 Attorneys at Law  
 499 W. Shaw Avenue, Suite 116  
 Fresno, California 93704  
 Telephone: (559) 248-4820  
 Facsimile: (559) 248-4830

Attorneys for Plaintiffs and Counter-Defendants (excluding Utherverse International, Ltd.)

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA – RENO DIVISION**

UTHERVERSE, INC., a Nevada corporation,  
 BRIAN SHUSTER, an individual,

Plaintiffs,

v.

BRIAN QUINN, an individual; JOSHUA  
 DENNE, and individual; BLOCKCHAIN  
 FUNDING, INC. a Delaware corporation;  
 BLOCKCHAIN ALLIANCE LLC, a  
 Wyoming Limited Liability Company;  
 MASTERNODE PARTNERS, LLC, a  
 Wyoming Limited Liability Company;  
 LYNNE MARTIN, an individual; NIYA  
 HOLDINGS, LLC, a Nevada limited liability  
 company; NIMA MOMAYEZ, an individual;  
 and JEREMY ROMA, an individual,

Defendants.

Case No. 3:25-cv-00020-MMD-CSD

**[PROPOSED] ORDER GRANTING  
 MOTION TO STRIKE AFFIRMATIVE  
 DEFENSES AND PORTIONS OF  
 AMENDED COUNTERCLAIM**

**Complaint Filed:** January 10, 2025

**Counterclaim Filed:** February 28, 2025

**Amended Counterclaim Filed:** April 27, 2025

Date: TBD  
 Time: TBD  
 Courtroom: TBD

AND RELATED COUNTERCLAIM.

Filed Concurrently with Notice of Motion and  
 Motion to Strike, and Memorandum of Points  
 and Authorities in Support Thereof

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

The Motion to Strike Affirmative Defenses Portions of Amended Counterclaim filed by Counter-Defendants (excluding Utherverse International, Ltd.; hereinafter “Moving Parties”) came on regularly for hearing before this Court on \_\_\_\_\_, 2025.

Having considered the moving and opposition papers, arguments, and all other matters presented to the Court, the Court finds that Affirmative Defenses Nos.1-33, and No. 36 in the Amended Answer are redundant, immaterial, impertinent, or scandalous material.

Furthermore, the Courts finds that following portions of Defendants’ Amended Counterclaim, identified by page and line number below, are immaterial, impertinent, scandalous, or otherwise improper:

21:1-10 (§§ 4 and 4a-d in their entirety)

21:15

24:9-12 (§ 31, in total)

25:24-26 (§ 36, starting after “but now refuses to do so”)

26:7-9 (§ 37, starting after “whatsoever”)

26:16-19 (§ 38, starting after “whatsoever”)

27:1-3 (§ 39, starting after “whatsoever”)

27:27-28:3 (§ 41, in total)

28:20-23 (§ 44, starting after “past”)

29:10-13 (§ 47, in total)

30:12-20 (§ 54, in total)

31:3-4 (§ 56, starting after “misrepresentations”)

31:5-32:24 (§ 56, portions lettered a-n)

32:25-27 (§ 57, in total)

36:3-18 (§§ 68, 69, in total)

1 It is **HEREBY ORDERED** that the Motion to Strike Affirmative Defenses and Portions  
2 of Amended Counterclaim is **GRANTED**. The listed Affirmative Defenses are ordered  
3 **STRIKEN** from Defendants' AMENDED ANSWER. The identified portions of the Amended  
4 Counterclaim are also ordered **STRIKEN**.

5  
6 Dated: \_\_\_\_\_

7 HON. JUDGE MIRANDA M. DU  
8 UNITED STATES DISTRICT JUDGE  
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